

THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

JAMES MCDONALD,

Plaintiff,

v.

ONEWEST BANK, FSB, NORTHWEST  
TRUSTEE SERVICES, INC., MORTGAGE  
ELECTRONIC REGISTRATION SYSTEMS,  
INC., INDYMAC BANK FSB, DOES 1-50,

Defendants.

No. 2:10-cv-01952-RSL

UNOPPOSED MOTION TO SCHEDULE  
EXPERT DISCOVERY BY ONEWEST  
BANK, FSB

NOTE ON MOTION CALENDAR: March  
29, 2013

Defendant OneWest Bank, FSB ("OneWest") hereby moves this Court for an order providing for OneWest to conduct expert discovery, scheduling a deadline for OneWest to provide an expert report regarding the authenticity of the promissory note at issue in this case, and scheduling a deadline by which plaintiff may depose that expert. OneWest proposes that its expert report be due on or before June 17, 2013, and that plaintiff may depose that expert before July 8, 2013.

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1 Counsel for OneWest has consulted with plaintiff's counsel, who does not object to this  
2 motion.

3 Dated: March 21, 2013.

4 ROUTH CRABTREE OLSEN, P.S.

5 /s/ Heidi Buck Morrison

6 Heidi Buck Morrison, WSBA # 41769  
7 Attorneys for Defendants OneWest Bank, F.S.B.,  
8 Mortgage Electronic Registration Systems, Inc.,  
9 and Northwest Trustee Services, Inc.

10 LARKINS VACURA LLP

11 /s/ Julie R. Vacura

12 Julie R. Vacura, WSBA # 34588  
13 Joseph D. Mueller, OSB # 111780 (*pro hac vice*)  
14 Attorneys for Defendant OneWest Bank, F.S.B.  
15 and Mortgage Electronic Registration Systems,  
16 Inc.

### CERTIFICATE OF SERVICE

I am employed in Multnomah County, State of Oregon. I am over the age of 18 and am not a party to the within action; my business address is 621 SW Morrison St., Suite 1450, Portland, Oregon 97205.

On March 21, 2013, I served the following document(s) described as:

**UNOPPOSED MOTION TO SCHEDULE EXPERT DISCOVERY BY  
ONEWEST BANK, FSB**

on the party or parties listed on the following page(s) in the following manner(s):

☐ **BY HAND DELIVERY:** For each party, I caused a copy of the document(s) to be placed in a sealed envelope and caused such envelope to be delivered by messenger to the street address(es) indicated on the attached service list.

☐ **BY FEDERAL EXPRESS:** For each party, I caused a copy of the document(s) to be placed in a sealed envelope and caused such envelope to be delivered by Federal Express to the street address (es) indicated on the attached service list.

☐ **BY FIRST-CLASS MAIL:** For each party, I caused a copy of the document(s) to be placed in a sealed envelope and caused such envelope to be deposited in the United States mail at Portland, Oregon, with first-class postage thereon fully prepaid and addressed to the street address(es) indicated on the attached service list.

☐ **BY FACSIMILE:** For each party, I caused a copy of the document(s) to be sent by facsimile to the facsimile number(s) indicated on the attached service list. If this action is pending in Oregon state court, then printed confirmation of receipt of the facsimile generated by the transmitting machine is attached hereto.

☐ **BY E-MAIL:** For each party, I caused a copy of the document(s) to be sent by electronic mail to the e-mail address(es) indicated on the attached service list. If this action is pending in Oregon state court, then I received confirmation that the e-mail was received.

☒ **BY ECF:** For each party, I caused a copy of the document(s) to be sent by electronic mail via ECF to the e-mail address(es) indicated on the attached service list.

I declare under penalty of perjury under the laws of the State of Oregon that the foregoing is true and correct.

/s/ Julie R. Vacura

Julie R. Vacura

Ha Thu Dao

[hadaojd@gmail.com](mailto:hadaojd@gmail.com)

Attorney for Plaintiff